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February 11, 2025

**Via ECF:**

Hon. Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

Re: **Randa Jaafar v. New York Spine and Sport Rehabilitation Medicine, P.C.**  
**Dkt. No. 24 Civ. 06588 (MKV)(SN)**

Your Honor:

This firm represents the Plaintiff, Randa Jaafar ("Plaintiff") in the above referenced action. The parties write jointly to respectfully request an adjournment of the Joint Letter and Proposed Case Management Plan currently scheduled for Tuesday, February 11, 2025 until the parties completed Court ordered mediation. This is the parties first request to adjourn the Joint Letter and Proposed Case Management Plan. The parties request will not affect any future deadlines.

By way of background, Plaintiff alleges Defendant discriminated against Plaintiff on the basis of her sex and gender and unlawfully terminated her in violation of the Title VII of the Civil Rights Act of 1964, NYHRL, and NYCHRL. Defendant denies Plaintiff's allegations. On January 14, 2025, Defendant interposed its answer, and this Court automatically referred the parties for mediation pursuant to the Second Amended Standing Order regarding counseled employment discrimination cases (See Dkt. Nos. 16). In furtherance of that Order, the parties are in the process of scheduling a mediation. The undersigned currently is scheduled for trial to begin March 31, 2025 Eastern District Court before Magistrate Judge Steven Locke. Furthermore, the undersigned is also scheduled for an Arbitration Hearing in the first week of May. Due to conflicts in both parties' schedules, mediation will most likely occur after the first week of May.

The parties make the herein request to adjourn the Joint Letter and Proposed Case Management Plan to attend mediation first before incurring the time and expense of full discovery. As such, the parties jointly respectfully request the Court adjourn the Joint Letter and Proposed Case Management Plan to a date and time following the mediation. The parties agree to update the Court on the date of mediation by February 24, 2025.

The parties the Court for its time and consideration of the herein request.

Respectfully,  
PHILLIPS & ASSOCIATES


/s/  
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Cc (via ECF): all counsel of record

This request is untimely. The Parties were previously admonished for failing to file timely requests for extensions and directed to § 2.G of the Individual Rules of Practice for this Court. *See* [ECF No. 8]. **The parties are reminded that failure to comply with this Order or with any order of the Court or comply with the FRCP, the Local Rules for the SDNY or this Court's Individual Practice Rules, or their discovery or other obligations may result in sanctions, including monetary penalties on counsel and/or the parties, dismissal or preclusion of claims, defenses, arguments, or evidence.**

The Parties request that the deadline to file a Joint Letter and Case Management Plan as required by the January 21, 2025 Order, [ECF No. 17], be extended to some time after a Mediation Session, not yet scheduled, which the parties advise will most likely be scheduled the first week of May. The Parties' request is HEREBY DENIED. The Parties are directed to file the materials required by the January 21, 2025 Order, [ECF No. 17], on or before March 6, 2025.  
SO ORDERED.

Date: 2/13/2025  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge